



LANDY WOLF

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November 2, 2020

VIA ECF

Hon. Lorna G. Schofield, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Tyler Erdman v. Adam Victor and The Board of Managers of the Manhattan Place Condominium*, S.D.N.Y. Case No. 20-cv-4162

Dear Judge Schofield,

We represent the defendant Board of Managers of Manhattan Place Condominium (the “Board”) in the above-referenced action. An initial conference is scheduled for November 5, 2020 at 10:50 AM. The parties were supposed to have submitted a joint letter with a proposed case management plan by Thursday, October 29th. However, after countless rounds of edits and e-mails with the pro se plaintiff, the parties could not agree on the phrasing of the letter. The plaintiff ultimately chose to file a letter blaming my firm for the lack of consensus. I am writing to briefly notify the Court that the breakdown in writing the letter is attributable to the plaintiff, who made edits to the letter at 8:34 PM, then circulated a “final” version at 10:02 PM, even though my firm did not approve of the changes he made. Given the late hour, we asked the plaintiff to wait until the following day to file the letter, but he refused. The next day, Friday, October 30th, my firm spent several more hours trying to persuade the plaintiff to sign off on a joint letter in which each party wrote its own description of the case (as that was the sticking point in the earlier draft) but he refused yet again.

Accordingly, we respectfully request that the Court excuse the Board for its inability to sign off on the ostensibly “joint” letter submitted by the plaintiff.

Respectfully,

A handwritten signature in black ink that reads 'Steven Landy'. The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Steven Landy

cc: Mr. Tyler Erdman (via ECF)
Jeffrey M. Eilender, Esq. (via ECF)
John F. Whelan, Esq. (via ECF)
David A. Wolf, Esq. (via ECF)